

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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CHARLES RASO, TRUSTEE  
of the MASSACHUSETTS BRICKLAYERS  
AND MASONS HEALTH AND WELFARE,  
PENSION AND ANNUITY FUNDS,

Plaintiff,

v.

STONEWORKS BY RAND, RAND  
STONEWORKS

and

BOWDOIN CONSTRUCTION  
CORPORATION

Defendants.

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C. A. No. 03-12535-RCL

**PLAINTIFF'S MOTION TO AMEND OF DISCOVERY SCHEDULE**

Under the Joint Pre-Trial Schedule in the above action, the deadline is November 10, 2004 for written discovery, December 10, 2004 for fact depositions and January 12, 2005 for expert witness depositions.

The Motion to Amend the Complaint to add Defendant Bowdoin was filed on September 16, 2004 and granted on November 1, 2004. In order to allow the plaintiff sufficient time for discovery with respect to Bowdoin and to facilitate the scheduling of fact depositions during the holiday season, Plaintiff requests an extension of the deadline for all discovery to February 10, 2005 with Motions for Summary Judgment to be filed by March 10, 2005.

Dated: November 24, 2004

Respectfully Submitted  
For the Plaintiff,

CHARLES RASO, FUND MANAGER  
of the MASACHUSETTS BRICKLAYERS  
AND MASONS HEALTH AND WELFARE  
PENSION AND ANNUITY FUNDS  
By his Attorney,

/s/ Catherine M. Campbell  
Catherine M. Campbell  
BBO# 549397  
Feinberg, Campbell & Zack, PC  
177 Milk Street  
Boston, MA 02109  
(617) 338-1976